



Sydney
Bay 5-7 North,
2 Locomotive St,
Eveleigh 2015

Brisbane
Level 4, 410 Queen St
Brisbane, QLD 4000

Melbourne
Level 14, 333 Collins St
Melbourne, VIC

www.evie.com.au info@evie.com.au

Submission to Australian Energy Market Commission

Facilitating EV charging infrastructure rollout under Commonwealth grants

Evie Networks | 25 June 2026

About Evie Networks

Evie Networks is Australia's largest owner-operator of public direct-current (DC) fast EV charging infrastructure. Since our establishment in 2018 we have built a national network of more than 300 charging stations and 1,000 bays of charging, serving all capital cities, intercity corridors and regional areas.

Over the past twelve months alone our national network has delivered approximately 40 GWh to drivers, enabling about 250 million kilometres of zero tail-pipe emission travel for drivers of passenger cars, light commercials and an emerging cohort of battery-electric trucks.

Executive Summary

Evie Networks supports competitive, privately financed charging as the fastest and cheapest path to Australia's EV uptake goals. Evie Networks does not support the rule change proposal submitted to the Australian Energy Market Commission (AEMC) by the Department of Climate Change, Energy, the Environment and Water (DCCEEW), namely because it does not recognise the competitive market for EV charging infrastructure (EVCI) that already exists. The rule change is premised on two propositions that have not been established:

1. that there is a market failure or "chicken and egg" problem preventing EVCI deployment; and

2. that there are objectively identifiable uncommercial regional blackspots requiring DNSP ownership or DNSP-led delivery.

On the evidence currently available, neither proposition has been demonstrated. The competitive EVCI market is still deploying infrastructure to keep pace with the needs of EV drivers, but that is not the same as market failure. CPOs have already invested ahead of demand, including in regional and intercity corridors, while bearing material utilisation, connection and tariff risk.

The proposed rule change risks creating the market failure it claims to solve. DNSPs already control connections processes of CPOs, including whether a connection is approved, connection costs, and the ongoing network tariff applied to energy supplied through that connection.

If that same DNSP is also enabled to own, install or control competing EVCI assets with regulated cost recovery, rational private investors will price in a materially higher risk of discrimination, cross-subsidy and market foreclosure.

The likely effect is to chill private capital at the precise time Australia needs private CPO investment to scale.

The asserted emissions benefit is not a sufficient basis for socialising contestable EVCI costs. DCCEE's claimed \$809 million in emissions benefits should carry little weight unless the underlying model and assumptions are published in a form that can be independently tested.

The methodology does not demonstrate the additionality of the proposed program, as it does not establish the counterfactual level of EV uptake and emissions reduction that would occur if charging infrastructure continued to be delivered by the competitive market without the program.

Additionally, modelling emissions benefits are not sufficient justification for shifting the costs of contestable EV charging infrastructure onto electricity consumers through DNSP-led deployment.

DNSP connection processes and tariffs are genuine barriers, but DNSP ownership is the wrong remedy. Connection timeframes, connection costs, preliminary assessment fees, opaque site information, inconsistent technical requirements and poorly designed tariffs are all genuine barriers to efficient rollout. These are monopoly-service reform problems. They should be solved through standardised service levels, published connection timeframes, rate cards, capped preliminary assessment fees, published capacity information, flexible connection models and tariffs designed for EV charging. They should not be solved by allowing the monopoly service provider to enter the contestable downstream market.

Connection services should remain subject to the existing framework and should not be reclassified or socialised for RAB recovery purposes merely because the customer is an EV charging provider.

Electricity consumers should not be used as the residual funder for transport infrastructure where the benefits have not been proven. The program is framed as

time-limited, but the physical assets and RAB recovery consequences are not time-limited in the same way. There is no adequate post-program treatment for assets installed by DNSPs. A five-year program endpoint does not address the competitive harm or consumer-cost risk if assets remain regulated, replaced, maintained or refinanced through later regulatory periods.

If genuine blackspots exist, they should be independently identified before any intervention is designed. “Blackspot” is not adequately defined and should not be determined by DNSPs or by the absence of charging on a particular street, pole or route segment. Before any intervention is designed, the AEMC should require a public, independent and evidence-based assessment of where charging is unavailable or materially inadequate, whether the gap is caused by commercial unviability, connection barriers, tariff barriers, planning barriers or lack of targeted grant support, whether DNSP ownership is necessary, and whether lower-distortion alternatives would solve the issue.

Alternative last-resort delivery options should be assessed before any DNSP-led approach is considered. If an independent assessment establishes both market failure and the existence of genuine blackspots, the appropriate response should not default to RAB-funded DNSP ownership. Competitive delivery by CPOs or motoring organisations should be considered first. DNSPs should remain focused on their essential enabling role: timely connections, transparent network information, efficient tariffs, safe technical standards and network planning support.

The AEMC must sequence related rule changes. The AEMC is considering this rule change alongside broader reforms on distribution ring-fencing and DNSP-led EV charging infrastructure. Sequencing is therefore critical. the Commonwealth program should not be used to create an early precedent for DNSP ownership of consumer-facing charging assets. The AEMC should first determine the enduring boundary between monopoly network services and contestable energy services, including the role of ring-fencing in protecting emerging markets. Making this rule now would risk pre-empting the Electricity Network Regulation Review and embedding the very market structure that review is intended to assess.

For these reasons, Evie submits that the proposed rule is not likely to promote efficient investment in, or efficient operation and use of, electricity services for the long-term interests of consumers. The AEMC should reject the rule change.

1. The AEMC should not accept DCCEEW's problem statement

Evie does not agree with the problem statement as described by DCCEEW. The proponent has identified a real need to accelerate EVCI deployment but has not demonstrated that the competitive market has failed or that DNSP ownership is necessary to address any identified gap.

A market can be early-stage and competitive at the same time. The existence of low early utilisation, uneven geographic coverage or slower-than-desired rollout does not by itself establish market failure. The more direct explanation is that deployment is being slowed by barriers that sit within monopoly network services and local coordination frameworks, including connection process delays and unpredictable costs, limited network capacity data, and network tariffs that are poorly designed for controllable EV charging load.

1.1. There is no demonstrated chicken-and-egg problem requiring DNSP ownership

Evie does not accept that there is a demonstrated chicken-and-egg problem in deploying AC kerbside EVCI, or public EVCI more generally, that requires DNSP ownership or RAB-funded delivery.

There are clear examples of commercial risk being taken in advance of EV uptake in Australia. Evie built a national network well in advance of mass-market EV adoption. Other market participants have also invested or are planning to invest across kerbside, destination, public DC, fleet and corridor use cases. This is inconsistent with a generalised proposition that private operators will not deploy until EV uptake is already mature.

1.2. There is no independently defined market failure for regional or remote blackspots

Evie recognises that regional communities and intercity routes need reliable charging infrastructure. However, the DCCEEW program does not adequately define regional blackspots or why there is a market failure.

'Blackspots' are not sufficiently defined in the consultation paper, which appears to rely on areas of need identified through DCCEEW's proposed Electric Vehicle Charging Infrastructure Mapping Tool. As such, it is unclear how 'blackspots' will eventually be defined through program implementation, which for example may be based on proximity from the next charger, or expected demand and utilisation. It is also difficult to justify treating these sites as "uncommercial" without first defining the problem the proposed intervention is intended to solve. Additionally, the identification of a blackspot is not, by itself, evidence of market failure.

Before any intervention is designed to address regional charging demand, there should be an independent public analysis that identifies:

- where charging is unavailable or materially inadequate;

- whether the gap is caused by low demand, high connection cost, network tariff design, lack of local government coordination, land access, planning constraints or lack of targeted grant support; and
- whether the site would be commercially viable under efficient connection costs and tariffs appropriate for EV charging.

Only after this assessment is completed could the AEMC properly test whether this rule change addresses a genuine market failure that necessitates government intervention facilitated by this rule change.

1.3. The barriers to efficient deployment are real, but they are not evidence of market failure

Australia needs a diverse mix of charging infrastructure to support drivers across metropolitan, suburban, regional and remote areas. Australia has substantial private sector interest in charging infrastructure deployment, with multiple operators active or planning entry across different charging use cases. However, several systemic barriers slow deployment and increase costs. These barriers ultimately harm consumers by increasing charging prices, delaying infrastructure availability and delaying the realisation of the grid benefits that well-integrated EV charging can provide.

Unpredictable connection costs and timelines

Connection approval timeframes remain uncertain and can vary materially by DNSP, site type and technical requirements. Connection costs can vary substantially between apparently similar sites. This increases project risk and makes marginal sites harder to progress.

Case study: A recent connection in our Victorian network required \$34,000 for minimal scope work to disconnect and reconnect supply. Another connection received an initial quote of \$75,000 that after we challenged, was reduced to \$35,000 for identical scope. A third site required a \$22,000 payment simply to receive a connection quote, with actual connection costs additional. These examples are not presented to criticise specific decisions but to demonstrate how current frameworks create unpredictability that increases capital costs and risk, ultimately harming Victorian consumers through higher charging prices.

This barrier is faced even by DEECEW's co-funded National Charging Network with NRMA. As noted in its *Lessons Learnt Report*:¹

"Securing timely connections from Distribution Network Service Providers (DNSPs) has been one of the most time-consuming aspects of the project. DNSP approval processes often delay the installation of charging infrastructure, especially when dealing with new technologies like BTM batteries. The uncertainty surrounding tariffs and the extended timelines for connection upgrades have created a bottleneck, leading to prolonged delays."

¹ NRMA. "National EV Charging Infrastructure Program – Lessons Learnt Report." Australian Renewable Energy Agency (ARENA), August 12, 2025. PDF.

Tariff structure mismatches

Many network tariffs were designed for traditional commercial and industrial loads, not highly controllable EV charging. Demand and capacity charges can penalise sites with high instantaneous load but low early utilisation, especially in regional and outer-suburban locations.

Case study: In one Victorian example, a site was assigned to a large business tariff because the connection "had the potential to go above 160MWh" despite forecast consumption of 80MWh and actual consumption proving to be only 40MWh. The site's network capacity charges exceeded total customer revenue, creating an unsustainable business model.

Coordination gaps

Successful deployment requires coordination between Commonwealth, state and local policy objectives, local government planning and parking management, network capacity planning, connection delivery and commercial site selection. At present, these elements often operate independently, creating inefficiencies that delay deployment and reduce infrastructure effectiveness.

Local governments report challenges coordinating with multiple infrastructure operators pursuing different strategies, networks responding to connection applications without visibility of broader deployment plans, and state policy settings that don't clearly prioritise transport electrification in planning and parking decisions. Infrastructure operators report difficulty accessing network capacity information necessary for efficient site selection, limited engagement from some local governments on parking and planning matters, and absence of clear state frameworks that prioritise or streamline charging infrastructure as essential transport infrastructure.

2. DNSP ownership is the wrong remedy and is not in the long-term interests of consumers

Every public charging site requires a network connection. DNSPs therefore have an essential role in enabling the rollout of EVCI through timely connections, transparent network information, efficient tariffs and safe technical standards. Allowing DNSPs to compete in the delivery of EVCI, or to own or recover the costs of consumer-facing charging infrastructure through their RAB, would blur the boundary between monopoly network services and contestable charging services.

Unlike traditional DNSP assets such as poles and wires, EVCI is not a natural monopoly and is already being delivered by CPOs other competitive market participants. While DNSPs earn regulated returns on capital invested, competitive businesses are incentivised to meet customers' needs and recover their investment by competing on site selection, utilisation, uptime, pricing, customer experience and operational efficiency.

Any proposal to move EVCI into the RAB would weaken this competitive discipline and shift utilisation risk from the asset owner to electricity consumers. If a regulated monopoly enters a competitive market, it carries structural advantages private competitors cannot match. These include regulated cost recovery, access to network information and control over connection timing and cost.

A rule that allows DNSPs to own and recover the cost of EVCI would materially change the investment risk profile of the sector. Rational investors will ask why they should fund charging infrastructure where the party that controls the connection process and can also become a regulated competitor.

The likely effect is to suppress private investment and create the market failure the rule change claims to solve. That is not in the long-term interests of consumers.

Evie recognises that the proposed program seeks to manage some of these issues through design features such as capped facility access fees and reduced connection-process burden for CPOs at program sites. However, those features do not justify DNSP ownership. They demonstrate that the relevant barriers are capable of being addressed directly through connection reform, access pricing, service standards, published network information and tariff reform, without allowing DNSPs to own or recover the cost of contestable EVCI assets through the RAB.

2.1. RAB-funded DNSP ownership does not satisfy the NEO long-term consumer interest test

The AEMC must assess whether the proposed rule is likely to promote efficient investment in, and efficient operation and use of, electricity services for the long-term interests of consumers in line with the National Electricity Objectives (NEO). In Evie's view, RAB-funded DNSP ownership of contestable EVCI does not satisfy that test.

The proposal may be framed as time-limited and low-cost on an average bill-impact basis, but that is not sufficient to show that this would be efficient and in the long-term interest of consumers.

The relevant question is whether the model is fair, efficient, competitive and directed to the actual barriers slowing EVCI deployment. On each of those measures, the proposed approach is deficient. At a high level, this is distilled into the four questions below:

- **Is it fair for everyone?** Will the approach benefit all residents - including those who don't yet own an electric vehicle - without unfairly shifting costs?
- **Does it deliver value for money?** Will the approach install the maximum number of chargers at the lowest overall cost to taxpayers and electricity customers?
- **Does it maintain healthy competition?** Will the approach preserve innovation and price competition that improves service quality and drives down costs for drivers?
- **Does it solve the actual problems?** Will the approach directly address the real barriers that are currently slowing down charger installations?

Fair for everyone	Socialising costs through electricity network charges requires non-EV users and consumers who may never use the funded chargers to contribute to contestable transport infrastructure.
--------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Value for money	DNSPs have weaker incentives to optimise site selection, utilisation, service quality and lifecycle cost where regulated returns are available through the RAB.
Healthy competition	DNSP ownership risks displacing private investment, suppressing innovation and giving monopoly businesses structural advantages over CPOs.
Solves the actual problems	The model does not directly fix connection delays, tariff mismatches, facility access, network data transparency or local coordination gaps. To the extent the program seeks to address these barriers (e.g., through capped access fees, improved site information, coordinated connection processes or the mapping tool), these reforms can be implemented directly and made available to all CPOs without allowing DNSPs to own EVCI assets or recover contestable charging costs through the RAB.

2.2. International evidence supports market-led co-funding, not centrally planned rollout

International experience does not support the proposition that centrally planned or utility ownership is necessary to accelerate EV charging deployment. Of the ten countries leading EV uptake, nine rely predominantly on competitive private-public partnership models. The exception is China, where state ownership of economic infrastructure is a broader feature of the market and is not a suitable model for Australia's regulatory framework.

The Netherlands and the United Kingdom provide relevant examples where competitive, market-led models deliver superior outcomes for customers. Both models channel public money into de-risking demand signals and local planning capacity, while leaving capital deployment and customer proposition to competitive CPOs. They have produced dense networks, fast delivery and scaled private-investment multiples.

	Netherlands	United Kingdom
Key programs	National Agenda for Charging Infrastructure regional concessions	<ul style="list-style-type: none"> On-Street Residential Charge-point Scheme (ORCS) 2017-24 Local EV Infrastructure (LEVI) Fund 2023-30
Scale delivered	Approximately 175,000 ² installations nationally	Approximately 75,000 ³ installations nationally, including LEVI and ORCS
Roles	Municipality awards concession; CPO finances, connects, installs and operates; network approves technical connection but does not own assets.	Local authority plans sites and tenders long-term contracts; CPO finances and operates; network provides connection under regulated timelines.
Trigger and planning tools	Statutory right-to-charge: any EV owner without a driveway can request a charging post. Responsible CPO must site within 300m of residence. ⁴	Triggered by local council tender processes. Planned through the NEVIS data platform, aggregating demand, grid capacity and charger

² McLoughlin, L. (2025, February 19). [Europe reaches 1 million public EV charge points, set to double by 2029](#). Electric Vehicle Charging & Infrastructure

³ Department for Transport. (2025, February 5). [Electric vehicle public charging infrastructure statistics: January 2025](#)

⁴ Guidehouse. (2021, November). [Lessons from the Dutch EV charging approach: Prepared for COP26 Transport Day for SSEN-Distribution](#). Guidehouse Inc

		density information to help capability officers rank need. ⁵
Grid service level	Grid operator screens sites but does not own assets. Connection deadlines are baked into the overall concession contract to CPOs - typically 12 weeks. ⁶	Grid operators screen sites but do not own assets. Regulations require grid operators to assess low-voltage sites within 15 working days, with compensation to CPOs for delay. ⁷
Key policy innovation	Demand signal locked in upfront: concession bundles grid connections, on-street permits and utilisation guarantees, letting CPOs finance at low risk.	Separates capability funding (policy, traffic orders and community engagement staff) from capital grants, accelerating councils that previously had no in-house expertise.
Equity wins	No regressive cross-subsidy. Captures renters. Equal access for drivers of need.	Capability grants create jobs and capacity within local councils, including remote and small councils. Planning criteria specifically targets households with no driveways.
Australian take-away	Use demand-driven approach, enabled by input from councils. Keep DNSPs as facilitators of connection, hosting capacity data and technical assessment - not owners.	Replicate LEVI-style capability funding and shared data-platform model. Establish mandatory guaranteed connection timeframes for low-voltage EVCI sites.

By contrast, centrally planned "build it and they will come" approaches create predictable risks: overspending, underutilised or stranded chargers, weaker customer accountability and poorer alignment between infrastructure deployment and real driver demand. This has been evidenced in Japan⁸ and South Korea⁹.

EV Adoption & Charger Infrastructure by Country

Region	Top 10 countries by EV adoption										Other cases		
	NOR	ICE	DEN	SWE	NLD	BEL	FIN	CHN	SWI	UK	KOR	JPN	AUS
% EVs	29%	18%	11%	11%	8.3%	8.2%	8.1%	7.6%	5.8%	5%	2.4%	0.8%	1.2%
% sales	93%	71%	46%	60%	35%	41%	54%	38%	30%	24%	7.9%	3.6%	12%
Chargers	1:33	1:28	1:18	1:16	1:5	1:11	1:19	1:8	1:17	1:30	1:3	1:17	1:66
Policy	PPP-driven; public grants & private ops; partial state involvement; no regulated monopoly	Early public buildout; now mostly private w/ govt co-funding for rural areas	Incentives for private market; targeted subsidies fill gaps	Govt grants catalyze private deployment; no state monopoly	City-driven PPPs; tender to private ops; some direct public ownership	Regional PPP concessions; no national monopoly; municipal partnerships	Modest govt support + EU funds; private-led competitive market	Hybrid central planning; state utilities + private ops; competitive subsidies	Market-driven with PPP coordination by federal govt	Market-led; govt grants & regulation; no state monopoly	Shifting from state-led to PPPs; growing private role; centrally planned	Subsidy-driven collaboration; auto, local govs & private ops	Initial company investment with private operators

 Centrally planned approach

⁵ Cenex (October 2022). [Article - Over 75 Local Authorities register for new EV infrastructure service](#)

⁶ NKL Nederland. (2018). [Uniform Standards for Charging Stations – EN-V1.0. Netherlands Knowledge Platform for Public Charging Infrastructure.](#)

⁷ Energy Saving Trust. (2025, March 6). [Connecting electric vehicle chargepoints to the electricity network. UK Government. The Electricity \(Standards of Performance\) \(Amendment\) Regulations 2023 \(SI 2023/887\).](#)

⁸ Bloomberg News, [Japan Doesn't Have Enough Electric Cars for Its EV Chargers](#), 25 August 2021

⁹ Despite having a high ratio of public chargers to cars, adoption has stalled at 9-10% of new car sales [[Roland Berger analysis 2024](#)], and that charging issues still rank as a key blocker for EV Uptake despite the density of charging [[Roland Berger analysis 2023](#)].

Figure 1 – Comparison of EV adoption and charger deployment by region.
Sources: IEA Global EV Data 2024 (data series ends 2023)

The AEMC should not adopt a rule change that moves Australia toward a centrally planned, monopoly-led model when successful international comparators point to competitive delivery supported by public coordination.

3. Claimed emissions benefits should carry little weight without transparent, testable modelling

DCCEEW claims the program will support 423,000 EVs, reduce emissions by 9.8 million tonnes of CO₂ and deliver \$809 million in emissions reduction benefit on an NPV basis. However, the underlying model and assumptions have not been published in a form that stakeholders can test. This is a material problem for two reasons.

First, if the emissions reductions are not additional to the rule change, the proposal does not demonstrate that it is likely to contribute to the emissions component of the National Electricity Objective in the way claimed. General transport decarbonisation benefits should not be treated as benefits unless the causal link to the program as facilitated by this rule change is established.

Second, even if some emissions benefit is additional, that does not by itself justify DNSP delivery or RAB-funded cost recovery. The AEMC must still be satisfied that the rule promotes efficient investment in, and efficient operation and use of, electricity services for the long-term interests of consumers. That requires consideration of whether the same emissions benefit could be achieved through less distortionary mechanisms to support the competitive delivery of EVCI.

It is not enough to model gross emissions reductions associated with assumed EV uptake. The proponent must show the emissions reductions attributed to the rule change, relative to what would occur without it. If a material share of the EV uptake or charger deployment would occur anyway (i.e., through the competitive market under existing policy settings), the claimed emissions benefit would fall sharply.

Given transparent counterfactual modelling has not been provided, the AEMC should place little weight on the claimed emissions benefits and should not rely on those benefits to justify DNSP ownership or the socialisation of contestable EVCI costs through electricity network charges.

4. The proposed cost recovery model should be rejected

The proposed rule would allow EVCI-related costs to enter DNSPs' RABs and be recovered from electricity consumers. DCCEEW proposes that the Commonwealth fund 30% of relevant DNSP capex and opex, with approximately 70% recovered from electricity consumers through the RAB. The rule change request models maximum capex additions of \$85.4 million and forecast opex over five years of \$11.8 million. It estimates a peak residential bill impact in 2029 of \$0.79 to \$1.44 per year.

A small average bill impact does not establish that the rule is in the long-term interests of consumers. A rule can have a small direct bill impact and still be inefficient if it

distorts competition, deters private investment, weakens operational discipline, embeds contestable assets in the RAB or creates precedent for broader monopoly expansion.

As such, Evie does not support electricity consumers being used as the residual funder for transport infrastructure. The appropriate model is for contestable EVCI costs to remain subject to user-pays and competitive funding principles, supported where necessary by transparent government grants targeted to independently identified gaps, rather than being recovered through DNSPs' regulated asset bases.

Contributions from all electricity consumers

Evie does not consider it appropriate for the difference between total project costs and the amount CPOs are willing to pay to be funded through a combination of government funding and contributions from all electricity consumers.

This framing assumes the gap is a social benefit (i.e., the benefits of emissions reduction). However, if emissions reduction is the policy objective, the Commonwealth could fund the program transparently through budget appropriations or targeted competitive grants, rather than by embedding contestable transport infrastructure costs in electricity network charges.

DNSP recovery of residual costs

Evie does not agree with the proposed RAB adjustment for capex, the proposed RAB adjustment for opex for the first five years, or treating ongoing opex in subsequent regulatory control periods in the same way as opex for standard control services.

If DNSPs believe these projects are efficient and commercially justified, they should take the same commercial risk as other market participants through ring-fenced competitive businesses, without RAB recovery and without preferential access to monopoly information or regulated cost recovery.

Timing of cost recovery

Because Evie does not support residual cost recovery through the RAB, it does not support recovery in the next regulatory control period or through a reopener in the current regulatory control period. The issue is not whether DNSPs recover costs sooner or later, but that DNSPs should not recover EVCI costs from electricity consumers at all.

5. Other NER changes and end-of-asset treatment

5.1. EVCI connection works classification

Evie supports a consistent and principled position that contestable EVCI costs, including connection works for a contestable EVCI asset, should not be shifted into the RAB merely because the customer is an EV charging provider.

However, the current user-pays framework must be reformed to improve transparency, predictability and efficiency for all EVCI proponents, not just DNSP-led projects. The AEMC should consider NER or AER reforms requiring DNSPs to provide:

- standardised public EVCI connection pathways;
- defined service level agreements for EVCI connection applications, including maximum response times, target approval timeframes and clear escalation pathways where DNSPs do not meet those timeframes;

- published connection performance reporting;
- standard rate cards for common connection works;
- capped quote and preliminary assessment fees;
- itemised cost breakdowns and clear augmentation triggers; and
- flexible connection agreements for controllable load.

5.2. End of asset lives

Evie does not support the premise that DNSPs should install or own EVCI assets under DCCEEW's proposed program.

Even if the AEMC were to impose strict end-of-asset-life conditions, those conditions would not eliminate the risk that DNSP-installed EVCI assets remain in regulated ownership or continue to receive regulated support beyond the program period. In practice, these assets may be difficult to sell or transfer to the competitive market. There is also a risk that DNSPs and their affiliates are better placed than independent CPOs to assess asset value, creating an information asymmetry in any sale or transfer process.

For that reason, if the AEMC proceeds with the rule change, any DNSP-installed EVCI assets must be subject to a clear and enforceable exit pathway from regulated ownership. At a minimum, the rules should require independent valuation, no preferential rights for DNSP affiliates, disclosure of operating, utilisation and uptime data, and removal of regulated cost recovery. DNSPs should not be permitted to replace EVCI assets at end of life or roll replacement capex or opex into the RAB. If no competitive buyer exists after a properly run process, the default outcome should be decommissioning.

6. Alternative last-resort delivery options should be assessed before any DNSP-led approach is considered.

Independent blackspot assessment before intervention

No regional blackspot intervention should proceed unless an independent assessment establishes that there is a genuine market failure, that the relevant locations are objectively identifiable as uncommercial blackspots, and that lower-distortion alternatives would not address the gap.

That assessment should define the relevant blackspot criteria, identify the cause of the gap, and test whether the location would remain uncommercial with efficient connection costs and appropriate tariffs for EVCI.

Only if that assessment demonstrates a genuine market failure, and that no lower-distortion alternative can address it, should the AEMC consider any form of last-resort intervention.

Competitive grants to CPOs or motoring organisations for blackspots

Even if a genuine regional blackspot is independently identified, it does not follow that DNSP-led delivery would maximise the long-term interests of consumers.

The proposed program does not appear to adequately test whether the same infrastructure could be delivered more efficiently by competitive or transport-focused parties, including CPOs or motoring organisations. For example, motoring clubs may be a better delivery partner than DNSPs because they are transport-facing, have direct member and driver accountability, and do not control electricity network access for competitors.

7. Conclusion and recommendations

Evie supports accelerating EV charging infrastructure and recognises the importance of reliable public charging for transport decarbonisation, driver confidence, regional access and grid utilisation. However, the proposed rule change is not the right mechanism.

This rule change would allow contestable EVCI costs to be recovered from electricity consumers through DNSP RABs despite no demonstrated market failure, no independently defined regional blackspots, no transparent additionality analysis for claimed emissions reduction benefits, material risk to private investment, unresolved post-program asset treatment and a direct conflict between DNSPs' monopoly role and competitive charging markets.

The AEMC should not allow a time-limited Commonwealth grant program to create a precedent for regulated DNSP ownership of consumer-facing charging infrastructure. The immediate task is to remove the real barriers to efficient deployment: slow and opaque connections, unpredictable costs, lack of network data, poor tariff design and local coordination gaps. Those barriers can be addressed directly without shifting contestable charging assets into the RAB.

Evie recommends that the AEMC:

1. **Reject the proposed rule change** and not allow DNSPs to recover contestable EVCI capex or opex through the RAB.
2. **Sequence this rule change behind the broader EVCI and ring-fencing work program.** The AEMC should not make this rule before resolving the enduring boundary between monopoly network services and contestable EV charging services, including through the Electricity Network Regulation Review and related ring-fencing and DNSP-led EVCI rule change processes.
3. **Require transparent emissions modelling before placing weight on claimed benefits,** including methodology, assumptions, charger utilisation and a transparent counterfactual scenario.
4. **Require an independent public assessment of market failure and regional blackspots before any last-resort intervention is designed.** This assessment should define the relevant blackspot criteria, identify the cause of the gap, test whether the site would remain uncommercial under efficient connection costs and tariffs appropriate for EV charging, and assess whether lower-distortion alternatives are available.
5. **Limit DNSPs to their proper enabling role.** DNSPs should focus on timely connections, transparent hosting capacity data, safe technical standards, efficient tariff design, flexible connection arrangements and network planning support. They should not own or recover the cost of consumer-facing charging infrastructure through regulated network charges.
6. **Reform DNSP connection processes** through standardised public EVCI connection pathways, defined service level agreements, maximum response times, target approval timeframes, escalation rights, published performance reporting, standard rate cards, capped quote and preliminary assessment fees, itemised cost breakdowns, clear augmentation triggers and equivalent treatment for DNSP-led and third-party projects.
7. **Develop network tariffs** that recognise controllability of EVCI, solar-soak capability, critical peak demand response and latent network capacity.

8. **If DNSP-installed assets are permitted despite Evie's objection, require enforceable exit pathway from regulated ownership**, such as mandatory sale or transfer to the competitive market at the end of the defined program period, with no DNSP replacement capex or ongoing RAB recovery.